

Message

From: Thompson, Lisa [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C4FE265551504398A47A9049EBA0AA13-THOMPSON, L]
Sent: 5/23/2018 1:45:58 PM
To: Kimberly Coy [kcoy@coybalboni.com]
CC: Amy Hambrick (Hambrick.Amy@epa.gov) [Hambrick.Amy@epa.gov]
Subject: RE: Subpart OOOO and OOOOa Annual Reports

Hi Kim,

Sorry for the delay! Please let me know if you have any questions about our responses below.

Thanks,
Lisa

From: Kimberly Coy [mailto:kcoy@coybalboni.com]
Sent: Tuesday, May 8, 2018 1:35 PM
To: Thompson, Lisa <Thompson.Lisa@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>
Subject: Subpart OOOO and OOOOa Annual Reports

Hi Lisa and Amy,

I have a few questions regarding the Annual Reports due under Subparts OOOO and OOOOa:

1. Can you verify that the Annual Report under §60.5420a(b) for OOOOa must be submitted through CEDRI, using USEPA's template for the 10/31/18 report. No, CEDRI reporting for OOOOa is not required at this time, but you may choose to submit using the draft template in CEDRI.
2. Do we have an option to combine the OOOO and OOOOa Annual Reports required under §60.5420(b) and §60.5420a(b) as one submission, and change the reporting period of OOOO report from Oct-Oct to Aug-Aug? Please check with your delegated authority. Generally you can change timeframes for reporting, as long as you are shortening them, not increasing them, as long as the delegated authority approves it. Also, some delegated authorities will allow a combination of reports, as long as all of the information is in the report.
3. If reports cannot be combined, can we submit the OOOO annual report through CEDRI, or do we have to submit hardcopy or electronic? Again, please check with your delegated authority. The OOOO annual reports should be submitted to your delegated authority since there's no electronic reporting required. However, once OOOOa is required electronically, if they are combined, then the delegated authority may optionally allow the OOOO report to be an attachment to the OOOOa template submitted through CEDRI. But, it's up to the delegated authority.
4. For reports submitted through CEDRI, does the Operator still have to submit reports to the State, or does the state obtain the data from CEDRI? Please check with the delegated authority if they want a hard copy or e-copy in addition to the submittal in CEDRI.

Thanks,
Kim



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